



November 30, 2022

Via ECF:

The Honorable Lorna G. Schofield
United States District Court
Southern District of New York
500 Pearl Street
New York, New York 10007

Re: ***Ulku Rowe v. Google LLC, Case No. 19-cv-08655 (LGS)(GWG)***

Dear Judge Schofield:

We represent Plaintiff Ulku Rowe in the above-referenced matter. Pursuant to the parties' Stipulated Protective Order (ECF No. 23, the "Protective Order"), and Rule I.D.3 of your Honor's Individual Rules, Plaintiff redacted certain portions of her Opposition to Defendant's Letter Motion requesting leave to take *de bene esse* depositions. The redacted portions of Plaintiff's Opposition relate to a document marked as "Confidential" by Defendant in this matter. Plaintiff met and conferred with Defendant in an effort to determine whether this redaction could be exempted from the Protective Order and filed publicly, but Defendant has maintained its confidentiality designation as to this redaction. Although Plaintiff has filed this letter under seal in order to comply with the Protective Order, she submits that the letter should be filed as part of the public record without redactions and not under seal, as Google has not shown good cause why the redacted portions of the letter require the extraordinary protection of sealing. *See New York v. Actavis, PLC*, No. 14 Civ. 7473, 2014 WL 5353774, at *2-3 (S.D.N.Y. Oct. 21, 2014) (the party seeking to seal has the burden of demonstrating by specific, on the record facts the reason why sealing is appropriate)

Respectfully submitted,

/s/ Cara E. Greene

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cc: All counsel of record (via ECF)

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APPENDIX

The following counsel of record should have access to the sealed documents:

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